



O.E.P.A.
S.E.D.O.

CLOW WATER SYSTEMS COMPANY

2006 JAN 30 AM 11:51

2266 South Sixth Street
P.O. Box 6001
Coshocton, Ohio 43812
(740) 622-6651
FAX (740) 622-8551

January 26, 2006

Zach Hamlin
Division of Air Pollution Control
Ohio Environmental Protection Agency Southeast District Office
2195 Front Street
Logan, Ohio 43138-9031

Reference: 4th Quarter 2005 – Deviation Report

Dear Mr. Hamlin,

Enclosed is the 4th quarter report. As requested Clow is including the below verbiage from the General Terms and Conditions in the Title V Permit. "Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate and complete."

Sincerely

Jeff S. Otterstedt
Vice President and General Manager

4th Quarter 2005 Report

O.E.P.A.
S.E.D.C.

I have reviewed the 4th quarter records on the following emission units and have found the following:

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Unit	Parameters	Findings
F002	Visible emissions	No deviations
F005	VOC limits	No deviations
	Visible emissions	No deviations
F022	VOC limits	No deviations
	Visible emissions	No deviations
F014	VOC limits	No deviations
	Visible emissions	No deviations
	Total VOC Emissions (annual)	0.42 tons
K002	Non-compliant coatings	None used
	Filtration system	No deviations
K005	Non-compliant coatings	None used
K006	Non-compliant coatings	None used
	Filtration system	No deviations
K007	Non-compliant coatings	None used
K008	Non-compliant coatings	None used
K009	Non-compliant coatings	None used
	VOC limits	No deviations
	Total VOC Emissions (annual)	1.72 tons
P033	Non-compliant fuels	None used
P901	1) Exhaust gases burned at 1300°F min.	See attached
	2) Minimum 35" H ₂ O DP across venturi	See attached

Emission Unit P901 – Cupola

Afterburner Temperature < 1300 F

Date	Duration (minutes)	Cause	Conclusion
10/6/05	5	Start up	Full ladle
10/14/05	3	Start up	Full ladle
10/18/05	4	Dropped Charge	Clean up charge – restarted
10/24/05	15	Stack down – oversized material	Restart
10/25/05	10	Lost west fan	Restart
11/8/05	7	Full Ladle	Restart
11/11/05	5	Afterburner will not light up	Restart afterburner
11/16/05	1	Full Ladle	Restart
11/18/05	41	Full Ladle	Restart
11/28/05	12	Low DP – increase fans	Stabilized system
12/1/05	20	Full Ladle	Restart
12/2/05	1	Full Ladle	Restart
12/5/05	12	Unknown	
12/7/05	15	Full Ladle	Restart
12/12/05	19	Full Ladle	Restart
12/15/05	20	Compensating for venturi issues	
12/16/05	21	Unknown	
12/22/05	3	Unknown	
12/23/05	1	Full Ladle	Restart

11/29/05 Missing Data 20:49 – 21:01

11/30/05 Missing Data 20:52 – 21:12

12/1/05 Missing Data 15:32 – 15:36

Pressure < 35 inches and > 60

Date	Duration (min)	Cause	Solution
10/3/05	60	Low value	
10/4/05	30	Low value	W.O. 230075
10/23/05	30	Low value	
10/25/05	30	Low value	
11/8/05	30	Low value	
11/16/05	30	Low value	
11/20/05	30	Low value	
11/22/05	30	Low value	
11/23/05	150	Pressure line plugged	Unplugged line
11/28/05	30	Low value	
11/29/05	30	Low value	
12/12/05	30	High value	
12/15/05	30	Low value	
12/18/05	30	Low value	